

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

U.S. DISTRICT COURT  
DISTRICT OF N.H.  
FILED

2013 AUG 15 P 4: 18

UNITED STATES OF AMERICA )

v. )

JOHN BRYAN VILLEGAS )

1:13-cr-75-01-SM

**INFORMATION**

**BACKGROUND**

The United States Attorney Charges:

1. At all times relevant to this information, defendant JOHN BRYAN VILLEGAS resided and worked in Kittery, Maine, where he was enlisted in the United States Navy.
2. At all times relevant to this information, a person whose identity is known to the government and known to the defendant but is identified herein as "Jane Doe" resided in the District of New Hampshire.
3. Jane Doe owned a laptop computer on which she stored private photographs of herself that were of a sexual nature.
4. From in or about April 7, 2012-July 16, 2012, VILLEGAS, without Jane Doe's knowledge or consent, repeatedly viewed the private photographs of Jane Doe's that were of a sexual nature and that had been stored on her laptop computer.
5. On or about July 2, 2012, VILLEGAS, using some else's name and contact information, created an electronic mail ("e-mail") account with Google, a California-based e-mail provider. For the e-mail address, VILLEGAS used Jane Doe's maiden name, appended with the phrase "xoxo" (i.e., "[JANE DOE'S MAIDEN NAME]xoxo@gmail.com," hereinafter referred to as "the 'xoxo' account").

6. From approximately July 10-July 16, 2012, using the “xoxo” account, VILLEGAS, while outside of the District of New Hampshire, anonymously sent multiple e-mail messages to Jane Doe, who was in the District of New Hampshire.
7. In sending his e-mail messages to Jane Doe, VILLEGAS used an interactive computer service and facilities of interstate commerce, and those messages travelled in interstate commerce.
8. In his e-mail messages to Jane Doe, VILLEGAS told her that he had “a lot” of “x-rated” photographs of her. As proof, he described, in detail, various sexually explicit photographs of her and sent her several sample photographs, namely, the private photographs of a sexual nature that were stored on Jane Doe’s stolen laptop computer. VILLEGAS directed Jane Doe to take additional, new photographs and videos of herself engaging in various sexually explicit scenarios that he specified. He directed Jane Doe to send those sexually explicit photographs and videos to him via e-mail. When Jane Doe refused, VILLEGAS told Jane Doe that if Jane Doe did not comply, he would “dox” her. As VILLEGAS explained “doxing” to Jane Doe, he would “leak” on the internet the photographs and other personal information about her that VILLEGAS already had. VILLEGAS also demonstrated to Jane Doe that he knew her name, where she resided, her young son’s name, her boyfriend’s name, her ex-husband’s name, and where she worked. He warned Jane Doe that if she did not provide him with the requested additional sexually explicit photographs and videos, he would send the ones that he already had throughout Dover, New Hampshire, as well as to her ex-husband, boyfriend, and a recent former employer.

9. For example, on or about July 11, 2012, VILLEGAS sent Jane Doe an e-mail stating, "I don't mind getting rid of these . . . Not for free though . . . I want to see more of you . . . " and then described various sexually explicit poses and scenarios, including "bonus points . . . if you use toys and actually get off on camera . . . get loud for me . . . close ups as well . . . "
10. On or about July 16, 2012, Jane Doe sent "xoxo" an email stating: "I still don't even understand how you have them [the sexually explicit photographs of her] to begin with and if they get out it'll ruin my reputation. I'm trying to start a new life and this would absolutely fuck everything up I'm trying to accomplish. I don't even know who the hell you are and why you actually have them."
11. On or about July 16, 2012, VILLEGAS sent Jane Doe a series of e-mail messages stating, "alright [sic] be like that then. see what i do with these . . . think im [sic] a sick bastard? then im [sic] going to act like one. familiar with doxing? look it up. have fun! . . . i told you. call me a sick bastard Im going to act like one . . . definition of DOXING leaking Personal information about people on the Internet, often including real name, known aliases, email addresses, general location, pictures . . . [sic]"
12. On or about July 16, 2012, Jane Doe sent "xoxo" an e-mail stating, "I just don't want these photos getting out. I don't want my info being leaked or anything please I have a family and I can't risk my sons [sic] safety. Please don't"
13. On or about July 16, 2012, VILLEGAS sent Jane Doe an e-mail stating, "yeah i agree. so i bet now youre [sic] more willing to comply to my request? see we do have a thing going. If you're still willing to do your portfolio. Im [sic] still here to help."

14. On or about July 16, 2012, VILLEGAS sent Jane Doe an e-mail stating, “Do you think [name of Jane Doe’s former employer] would be able to appreciate these artistic shots? Uhm [first and last name of Jane Doe’s ex-husband]? Or [first name of Jane Doe’s boyfriend]? Would they be able to appreciate these? Im [sic] really looking forward to your reply.” He followed up with “That’s fine just ignore me I’ll send envelopes of pictures to places around Dover, NH and [Jane Doe’s former employer].”

**COUNT ONE**

15. The United States Attorney realleges and incorporates by reference paragraphs 1-14 of this Information and further charges that:

From on or about April 7, 2012 through on or about July 17, 2012, in the District of New Hampshire and elsewhere, defendant

**JOHN BRYAN VILLEGAS,**

while outside of New Hampshire and with the intent to harass and to cause substantial emotional distress to a person, identified herein as Jane Doe, in another state, namely New Hampshire, used an interactive computer service and a facility of interstate commerce, including e-mail, to engage in a course of conduct, as described in paragraphs 1-14 above, that caused substantial emotional distress to Jane Doe.


All in violation of Title 18, United States Code, Section 2261A(2)(A).

August 15, 2013

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By:

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